

**Commonwealth of Kentucky
Natural Resources and Environmental Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
(502) 573-3382**

**STATE ORIGIN
AIR QUALITY PERMIT**

Permittee Name: Monticello Wood Industries, LLC
Mailing Address: 762 Old Highway #90, Monticello, Kentucky 42633

Source Name: Monticello Wood Industries, LLC Plant #2
Mailing Address: Same as above
Source Location: Monticello/Wayne, Kentucky

KYEIS ID #: 021-231-00003
SIC Code: 2426

Regional Office London Regional Office
875 S. Main Street
London, KY 40741
(606) 878-0157

County: Wayne

Permit Number: S-02-078
Log Number: 54684
Permit Type: Minor Operating

Application
Complete Date: June 12, 2002
Issuance Date: February 5, 2003
Expiration Date: February 5, 2013

**John S. Lyons, Director
Division for Air Quality**

SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit.

This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify an affected facility without first having submitted a complete application and receiving a permit for the planned activity from the Division, except as provided in this permit or in 401 KAR 52:040, State-origin permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining other permits, licenses, or approvals that may be required by the Cabinet or other federal, state, or local agencies.

UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

SECTION B - EMISSION POINTS, EMISSIONS

Emissions Unit: 01 -Milling Operations

Description:

Controls: Baghouse and Cyclone

Multiple unfinished wood-flooring manufacturing units

Maximum continuous rating: 11.25 tons/hr

Construction Completed in 1973

APPLICABLE REGULATIONS:

Regulation 401 KAR 61:020 Existing Process Operations, applicable to an emissions unit commenced before July 2, 1975.

1. Operating Limitations:

None

2. Emission Limitations:

- a) Pursuant to Regulation 401 KAR 61:020, particulate emissions from the baghouse and cyclone shall not exceed 20.75 lbs/hr based on a three-hour average.
- b) Pursuant to Regulation 410 KAR 61:020, Section 3(1)(a), continuous emissions shall not exceed 40 percent opacity.

Compliance Demonstration Method:

- a) Performance tests used to demonstrate compliance with the particulate matter standard as listed above shall be conducted according to Reference Method 5. The sampling time and sample volume for each run shall be at least 60 minutes and 31.8 dscf.
- b) In determining compliance with the opacity standard as listed above, the owner or operator shall use Reference Method 9.

3. Testing Requirements:

None

4. Specific Monitoring Requirements:

None

5. Specific Record Keeping Requirements:

Permittee shall record and maintain records of the amount of wood processed and the hours of operations of the facility.

6. Specific Reporting Requirements:

See Section C, General Conditions C.1, C.2, and C.3

7. Specific Control Equipment Operating Conditions:

Baghouse efficiency must be maintained at 90% and cyclone efficiency at 80% as submitted by the applicant.

SECTION B EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS AND OPERATING CONDITIONS (CONTINUED)

Emissions Unit: 02 – Indirect Heat Exchanger

Description:

Wood Waste Boiler

Pacific Steel Fire Tube Boiler

Maximum continuous rating: 3.64 MMBtu/hr

Construction Completed in 1973

APPLICABLE REGULATIONS:

Regulation 401 KAR 59:015, New indirect heat exchangers, applicable to an emissions unit less than 250 mm BTU/hr and commenced on or after April 9, 1972.

1. Operating Limitations:

None

2. Emission Limitations:

- a. Pursuant to Regulation 401 KAR 59:015, Section 4(2), emissions shall not exceed 20 percent opacity based on a six-minute average, except that a maximum of 40% opacity based on a six minute average shall be permitted for not more than 6 consecutive minutes in any consecutive 60 minutes during cleaning the fire-box or blowing soot.
- b. Pursuant to Regulation 401 KAR 59:015, Section 4(1)(a), particulate emission shall not exceed 0.56 lb/MMBTU based on a three hour average. This unit is considered to be in compliance with the allowable particulate emission limitation while burning wood.
- c. Pursuant to Regulation 401 KAR 59:015, Section 5(1)(a), Sulfur Dioxide emissions shall not exceed 5.0 lb/MMBTU actual heat input while burning solid fuels.

3. Testing Requirements:

The permittee shall determine the opacity of emissions from the stack using U.S. EPA Reference Method 9 annually, or more frequently if requested by the Division.

SECTION B EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS AND OPERATING CONDITIONS (CONTINUED)

4. **Specific Monitoring Requirements:**

Particulate, sulfur dioxide, and visible emissions as measured by methods referenced in Regulation 401 KAR 50:015, Documents incorporated by reference, Section 1, shall not exceed the respective limitations specified herein

5. **Specific Record Keeping Requirements:**

The permittee shall record and maintain records of the amount of wood fuel combusted by the boiler on a daily basis.

6. **Specific Reporting Requirements:**

See Section C

SECTION B EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emissions Unit: 03 – Haul Road and Yard, Unpaved

Description:

Water suppression used to control dust

Used for moving materials in and out of the facility

Maximum continuous rating: 3.0 tons/hr

APPLICABLE REGULATIONS:

Regulation 401 KAR 63:010, Fugitive Emissions.

1. Operating Limitations:

N/A

2. Emission Limitations:

The materials processed at the facility listed above shall be controlled with wet suppression and/or enclosures so as to comply with the requirements specified in Regulation 401 KAR 63:010, Fugitive emissions, Section 3, Standards for fugitive emissions.

3. Testing Requirements:

None

4. Specific Monitoring Requirements:

See Section C

5. Specific Record Keeping Requirements:

See Section C

6. Specific Reporting Requirements:

See Section C

7. Specific Control Equipment Operating Conditions:

None

SECTION B EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emissions Unit: 05 – Adhesive Station

Description:

Rotary gluing process

High tack PVAC homopolymer, IB-755, used as adhesive

Maximum continuous rating: 1.56 lbs/hr

Operation commenced in 1973

APPLICABLE REGULATIONS:

Regulation 401 KAR 63:020, Potentially hazardous matter or toxic substances.

1. Operating Limitations:

None

2. Emission Limitations:

None

3. Testing Requirements:

None

4. Specific Monitoring Requirements:

None

5. Specific Record Keeping Requirements:

None

6. Specific Reporting Requirements:

See Section C

7. Specific Control Equipment Operating Conditions:

None

SECTION C - GENERAL CONDITIONS

A. Administrative Requirements

1. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:040, Section 3(1)(b) and is grounds for enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.
2. This permit shall remain in effect for a fixed term of ten (10) years following the original date of issuance. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division [401 KAR 52:040, Section 15].
3. Any condition or portion of this permit, which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit.
4. This permit may be revised, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance shall not stay any permit condition.
5. This permit does not convey property rights or exclusive privileges.
6. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:040 Section 11(3)].
7. This Permit shall be subject to suspension at any time the permittee fails to pay all fees within 90 days after notification as specified in 401 KAR 50:038, Air emissions fee. The permittee shall submit an annual emissions certification pursuant to 401 KAR 52:040, Section 20.
8. All previously issued construction and operating permits are hereby null and void.

SECTION C - GENERAL CONDITIONS (CONTINUED)

B. Recordkeeping Requirements

1. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of at least five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [401 KAR 52:040 Section 3(1)(f)].
2. The permittee shall perform compliance certification and recordkeeping sufficient to assure compliance with the terms and conditions of the permit. Documents, including reports, shall be certified by a responsible official [401 KAR 52:040, Section 21].

C. Reporting Requirements

1. a. In accordance with the provisions of 401 KAR 50:055, Section 1 the permittee shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
 - i. When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
 - ii. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other approved electronic media) and shall cause written notice upon request.
- b. The permittee shall promptly report deviations from permit requirements including those attributed to upset conditions (other than emission exceedances covered by 1.a above), the probable cause of the deviation, and corrective or preventive measures taken; to the Regional Office listed on the front of this permit within 30 days. Other deviations from permit requirements shall be included in the semiannual report.
2. The permittee shall furnish information requested by the cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or compliance with the permit.
3. Summary reports of monitoring required by this permit shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation.

The summary reports are due January 30th and July 30th of each year. All reports shall be certified by a responsible official. All deviations from permit requirements shall be clearly identified in the reports [401 KAR 52:040, Section 21].

SECTION C - GENERAL CONDITIONS (CONTINUED)

D. Inspections

1. In accordance with the requirements of 401 KAR 52:040, Section 3(1)(f) the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times:
 - a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation;
 - b. To access and copy any records required by the permit;
 - c. Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit. Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency.
 - d. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

E. Emergencies/Enforcement Provisions

1. The permittee shall not use as defense in an enforcement action, the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance.
2. An emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
 - a. An emergency occurred and the permittee can identify the cause of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
 - d. The permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division within two working days after the time when emission limitations were exceeded due to the emergency and included a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
3. Emergency provisions listed in General Condition E.2 are in addition to any emergency or upset provision contained in an applicable requirement.
4. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof.

SECTION C - GENERAL CONDITIONS (CONTINUED)**F. Compliance**

1. Periodic testing or instrumental or non-instrumental monitoring, which may consist of record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstration of continuing compliance with the conditions of this permit. For the purpose of demonstration of continuing compliance, the following guidelines shall be followed:
 - a. Pursuant to 401 KAR 50:055, General compliance requirements, Section 2(5), all air pollution control equipment and all pollution control measures proposed by the application in response to which this permit is issued shall be in place, properly maintained, and in operation at any time an affected facility for which the equipment and measures are designed is operated, except as provided by 401 KAR 50:055, Section 1.
 - b. All the air pollution control systems shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers. A log shall be kept of all routine and non-routine maintenance performed on each control device.
 - c. A log of the monthly raw material consumption and monthly production rates shall be kept available at the facility. Compliance with the emission limits may be demonstrated by computer program, spread sheets, calculations or performance tests as may be specified by the Division.
2. Pursuant to 401 KAR 52:040, Section 19, the permittee shall certify compliance with the terms and conditions contained in this permit by January 30th of each year, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an approved alternative) to the Regional Office listed on the front of this permit in accordance with the following requirements:
 - a. Identification of the term or condition;
 - b. Compliance status of each term or condition of the permit;
 - c. Whether compliance was continuous or intermittent;
 - d. The method used for determining the compliance status for the source, currently and over the reporting period, and
 - e. For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.
 - f. The certification shall be postmarked by January 30th of each year. Annual compliance certifications should be mailed to the following addresses:

Division for Air Quality London Regional Office 875 S. Main St. London, KY 40741	Division for Air Quality Central Files 803 Schenkel Lane Frankfort, KY 40601-1403
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3. Permit Shield - A permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with all:
 - (a) Applicable requirements that are included and specifically identified in this permit; or
 - (b) Non-applicable requirements expressly identified in this permit.

SECTION D - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:040, Section 6. While these activities are designated as insignificant the permittee shall comply with the applicable regulation and any level of periodic monitoring specified below.

Description

1. EP04 Wood Kilns, 3.0 ton/hr (5)

Generally Applicable Regulations

401 KAR 59:010